



## Environmental Management Program Final Report (Fiscal Year 2009)

**Introduction:** This report summarizes the results of our Environmental Management Program (EMP) in meeting the Waste Reduction and Disposal Division's (WRAD) objectives and targets for fiscal year 2009 (July 2008-June 2009).

The following list of objectives and targets were developed and implemented into our EMP program for fiscal year 2009:

## **Regulatory Compliance**

<u>Objective</u> - Be prepared to implement enhanced surface emissions program to meet new standard upon regulatory enactment.

<u>Target</u> – Identify necessary resources and methods to meet 200 ppm surface emissions standard including monitoring and record keeping at the Miramar landfill.

<u>Program</u> - Follow proposed California Air Resources Board rulemaking "Methane Emissions from Municipal Solid Waste Landfills" particularly the "Landfill Methane Surface Emission Limit" which includes "Instantaneous Landfill Methane Surface Monitoring Requirements" and "Record Keeping and Reporting Requirements." <u>Results</u>

- The Rule is still in the draft stage and the latest draft issued in March contains changes that will not require the procurement of new monitoring equipment. The current draft rule allows 500 ppm emissions as the compliance standard and only requires recording 200ppm levels if found. There is a 25ppm integrated (averaged) emissions standard that must be met which requires 25 ft switchbacks, etc. to document it.

Other new language in the rule exempts older sites before 1977 so now only Chollas and North & West Miramar will have to comply, and possibly South Miramar because of the NSPS standard. Benefits of these changes include: eliminates a significant financial impact- cost to install a gas collection system \$2M at Mission Bay, and, reduces the projected staffing and contractual services needed. But recent estimates of these services show that there's still a great deal of field work and record keeping involved in the new monitoring. The tentative rule effective date 12/09 is from IWMB staff but seems improbable. Implementing the rule through local air districts will require local public hearings, workshops, etc which could mean two years to implement. We have decided that our operational budget for FY11 will reflect rule needs. This EMP will be carried forward into the next fiscal year.

## **Prevention of Pollution**

<u>Objective</u> - Maximize diversion of HHW batteries and fluorescent light bulbs entering the Miramar Landfill.

<u>Target</u> - 95% diversion of items brought to the landfill by private and self-haulers. <u>Program</u> - Investigate and if feasible, develop battery and light bulb screening and removal program at the fee booth in cooperation with the landfill Hazardous Substance Enforcement Team (HSET).

<u>Results</u> – Due to the potential for breakage of fluorescent light bulbs and spills or leakage from batteries it was decided that the fee booth staff will not attempt to remove any light bulbs or batteries discovered during load checks. Any special or hazardous waste

discovered will result in either the customer being directed to a proper disposal facility or a call to the HSET duty inspector who will direct the proper disposal and/or handling of the items in question. This EMP will be closed.

<u>Objective</u> - Maximize recycling efforts of Navy and non-profit waste haulers Target - 75% compliance with program within the first year.

<u>Program</u> - Develop large customer recycling diversion program for DOD and Non-Profit organizations depositing excessive amounts of recyclable material in landfill.

<u>Results</u> - Existing practices at the fee booth have met the intended objective and target with no additional monitoring or program improvements required. The DOD has diversion programs already in place and non-profits have been instructed on diversion options. This EMP will be closed.

## **Continuous Improvement**

<u>Objective</u> - Determine if the Ethos fuel additive product will increase the time between cleaning the Particulate Matter (PM) filter on the Morgan Trommel screen enough to offset the cost of the product based on reduced labor time to clean the filter due to increased operational hours required between filter cleaning.

<u>Target</u> - Increase operational hours of trommel screen to exceed 200 hours between PM filter cleanings.

<u>Program</u> - ESD will identify and provide the necessary equipment for the pilot study as well as previous consumption rates for the Morgan Trommel to establish a current baseline for comparison. Vendor will conduct several opacity tests to establish an initial baseline, track progress and determine a final opacity test result based on stack/tailpipe emissions. Vendor will also provide the product and staff necessary to administer the test throughout the entire pilot test period.

<u>Results</u> – The test may not have been the correct application for this type of product. The actual results increased the periodicity for filter cleaning due to increased levels of PM being deposited onto the filter medium. This test proved that the product increased the amount of PM removed during the combustion process but had the unintended consequence of decreasing the operational time between filter cleaning to 38 hours vice the 200 hour average recorded prior to the test. This EMP will be closed.

**Conclusion:** The objectives and targets for this fiscal year have met with various degrees of success or in the case of the trommel filter, achieved improvement with the unintended consequence of increased filter cleaning periods. These particular environmental management programs will be closed out with the exception of "Methane Emissions from Municipal Solid Waste Landfills" CIWMB rulemaking which will carry over into the next fiscal year. Additional objectives and targets will also be identified and implemented for fiscal year 2010.